

Bray Communications

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TO: FCC

RE: Comments on Proceeding 02-278

Bray Communications provides association management services to several professional trade groups in the San Antonio area. These groups hold monthly meetings, and one of the primary ways we use to notify members of these meetings is via fax. Members have an expectation of receiving meeting notices via fax on a regular basis.

Removing the "prior business relationship" provision from the rules concerning unsolicited faxes would be absolutely devastating to these trade groups. It would force each of them to obtain prior written consent from every single member before they could be notified of an upcoming meeting. These groups are relatively small and don't have many resources; this requirement would be extremely burdensome to them, and completely unnecessary, as members already expect to receive such communications from the group. If the regulations are enacted "as is," it would have a devastating effect on membership participation, as the groups would be unable to use a primary means of meeting notification until all signatures could be obtained -- a process that could take weeks and be very expensive.

I urge you to please restore the "prior business relationship" language to this regulation so that we may continue to inform our membership of upcoming meetings on a timely basis, without onerous and unnecessary recordkeeping requirements.

Thank you.

Sincerely,

Laura Bray
Bray Communications